

REMARKS

In response to the Office Action (hereinafter, the "Action"), dated February 9, 2006, Applicant respectfully requests reconsideration based on the above claim amendments and the following remarks. Applicant respectfully submits that the claims as presented are in condition for allowance.

A review of the claims indicates that:

Claims 1-11 were previously pending.

Claims 3, 6, 9, and 10 are currently amended.

Claims 4, 5, 7, 8, and 11 remain in their original form.

Claims 1 and 2 have been previously presented.

Claims 12 and 13 are added.

No claims are currently cancelled.

Claims 1-13 are currently pending in this application, with claims 1, 9, and 13 being independent.

Claim Rejections under 35 U.S.C. §103(a)

Claims 1-11 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,876,865 to Sanger (hereinafter "Sanger") in view of U.S. Patent No. 6,097,801 to Williams et al. (hereinafter "Williams"). The Applicant respectfully traverses these rejections.

In view of the following remarks, Applicant respectfully requests reconsideration of the rejected claims.

Claim 1

Turning first to **independent Claim 1**, without conceding the propriety of the stated rejection, and without conceding that Sanger and Williams provide the teaching for which they were cited in the Action, the Applicant submits the following remarks traversing the rejection. For convenience of discussion, the Applicant reproduces here portions of claim 1:

Independent claim 1 defines a method, including:

“... ”

receiving the requested block of telephone numbers from the number pool organization, the received block of telephone numbers comprising a plurality of telephone numbers already in use by the other service providers and a plurality of telephone numbers not already in use by the other service providers;

retrieving from a database a list comprising the plurality of telephone numbers already in use by the other service providers and therefore unavailable for use as both telephone directory numbers and customer identifiers for customers of the receiving service provider; and

retrieving from a database, a location routing number of a switch of the receiving service provider associated with the plurality of telephone numbers not already in use by the other service providers and therefore available for use by the receiving service provider as both telephone directory numbers and customer identifiers for customers of the receiving service provider.”

Turning to the cited art, Sanger describes in general a method for subscriber availability in a radio communications system. Applicant agrees with the Office's assessment that Sanger “...does not disclose retrieving from a database, a location

1 routing number of a switch of the receiving service provider associated with the
2 plurality of telephone numbers not already in use by the other service providers
3 and therefore available for use by the receiving service provider as both telephone
4 directory numbers and customer identifiers for customers of the receiving service
5 provider” (Action, page 3). Applicant further submits Sanger does not teach or
6 suggest “...retrieving from a database a list comprising the plurality of telephone
7 numbers already in use by the other service providers and therefore unavailable for
8 use as both telephone directory numbers and customer identifiers for customers of
9 the receiving service provider...” as in Applicant’s claim 1.

10 Addressing Sanger in more detail, and without intending undue emphasis
11 on any portion of Sanger, Sanger describes a method that increases the availability
12 of subscribers acting as service providers of a radio communications system to
13 subscribers who are users of the system (Sanger, Col. 1, lines 39-43). The
14 providers are given a “service number” where they can be reached by users of the
15 system (Sanger, Col. 3, lines 44-45).

16 The Office supports the §103 rejection with Col. 3, lines 37-57 of Sanger
17 (Action, pages 3 and 4), which refers to the “service number” described above that
18 is assigned to a subscriber acting as a service provider. This section of Sanger
19 additionally states “[a] parameter ‘unassigned’ or ‘assigned’ needs to be allocated
20 to each service number. Once a service number is allocated to a service provider,
21 the service number is ‘assigned;’ otherwise, the service number is ‘unassigned.’ A
22 request for a service number is only granted if the service number is assigned”
23 (Sanger, Col. 3, lines 52-57). This reference to “assigned” and “unassigned”
24 service numbers to providers of a radio communications system does not teach or
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1 suggest "a list," received by a requesting telephone service provider, "comprising
2 the plurality of telephone numbers already in use by the other service providers
3 and therefore unavailable for use as both telephone directory numbers and
4 customer identifiers for customers of the receiving service provider," as recited in
5 Applicant's claim 1.

6 Furthermore, Sanger requires that the assignment of a service number to a
7 radio communications system service provider "...only [be] granted if the service
8 number is unassigned" (Sanger, Col. 3, lines 56-57). Therefore, Sanger fails to
9 teach or suggest "receiving the requested block of telephone numbers from the
10 number pool organization, the received block of telephone numbers comprising a
11 plurality of telephone numbers already in use by the other service providers and
12 a plurality of telephone numbers not already in use by the other service
13 providers" as recited in claim 1, where "telephone numbers already in use"
14 corresponds to an "assigned" number, and "telephone numbers not already in
15 use" corresponds to an "unassigned" number. Sanger fails to teach the described
16 elements of Applicant's claim 1.

17 Turning next to Williams, the Office cited Williams as disclosing
18 "...retrieving from a database (e.g. LNP table), a location routing number of a
19 switch (e.g. SCP or switching office) associated with the plurality of telephone
20 numbers," in support of the §103 rejection (Action, page 3). Without conceding
21 that Sanger and Williams provide the teaching for which they are cited in the
22 Action, the Applicant submits that Williams fails to remedy the shortcomings of
23 Sanger.
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1 Williams generally describes number portability using an enhanced routing
2 table. In particular, Williams describes a method to facilitate the deployment of
3 local number portability for ported numbers by eliminating the high costs and time
4 delays associated with database queries (Williams, Col. 4, lines 1-33). The
5 Applicant submits Williams does not teach "retrieving from a database, a location
6 routing number of a switch of the receiving service provider associated with the
7 plurality of telephone numbers not already in use by the other service providers
8 and therefore available for use by the receiving service provider as both telephone
9 directory numbers and customer identifiers for customers of the receiving service
10 provider," as in Applicant's claim 1.

11 Instead, Williams teaches methods for facilitating the retrieval of the local
12 routing number (LRN) of an individual ported number, when a call is placed from
13 a calling party to that number (Williams, Col. 4, lines 34-56). A method which
14 assists the retrieval of the LRN of an assigned, in use, ported telephone number,
15 where the retrieval occurs when a call is made to that ported number, as the
16 method in Williams discloses, does not teach "...retrieving from a database, a
17 location routing number of a switch of the receiving service provider associated
18 with the plurality of telephone numbers not already in use by the other service
19 providers," as in Applicant's claim 1. Williams discloses retrieving the LRN of an
20 individual telephone number that is in use, whereas Applicant's claim 1 recites the
21 retrieval of the LRN of a group of telephone numbers that are not in use.

22 For at least these reasons, Applicant respectfully submits Williams does not
23 supply the teachings missing from Sanger, and therefore the combination of
24 Sanger and Williams does not teach or suggest all the elements of Applicant's
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1 claim 1. Applicant respectfully requests that the §103 rejection be reconsidered
2 and withdrawn.

3 4 **Claims 2-8**

5 Claims 2-8 depend directly or indirectly from claim 1 and stand rejected on
6 similar grounds. The above comments directed to claim 1 apply equally to these
7 dependent claims that, for their own recited features, and in combination with
8 those recited in claim 1, are not taught by Sanger and Williams.

9 10 **Claim 9**

11 Turning to **independent claim 9**, without conceding the propriety of the
12 stated rejections and solely to advance the prosecution of this application, the
13 Applicant has amended claim 9 to further clarify features of the system. For
14 convenience, the Applicant reproduces claim 9 here:

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16 **Amended independent claim 9** defines a service provider including:

17 “an order management system for communicating between a number
18 pooling authority and a plurality of further components of the service
19 provider, wherein the service provider is for requesting a block of telephone
20 numbers to be used as both telephone directory numbers and customer
21 identifiers for customers of the service provider, wherein the number pool
organization is for coordinating donation and allocation of blocks of
telephone numbers for use by a plurality of service providers, including the
service provider and further service providers;

22 wherein the plurality of further components of the service provider
23 include a block administration center, a customer billing system, and a
24 facility management system, and wherein the order management system is
25 for updating the further components with information relating to telephone
numbers that are received when the service provider receives the block of
telephone numbers;

1 a list of telephone numbers already in use by other service providers
2 and therefore unavailable for use by the service provider, wherein the order
3 management system is for obtaining the list from a database containing the
4 block of telephone numbers received by the service provider; and

5 a location routing number of a switch associated with the plurality of
6 telephone numbers not already in use by other service providers and
7 therefore available for use by the service provider as both telephone
8 directory numbers and customer identifiers, wherein the order
9 management system is for obtaining the location routing number from a
10 database containing the block of telephone numbers received by the service
11 provider.”

12 The Applicant submits the revisions pertaining to the “service provider,”
13 the “order management system,” and “further components of the service
14 provider,” are fully supported under §112, 1st paragraph, in several places
15 throughout the Applicant’s description, at least by page 8, lines 25-27; page 9,
16 lines 1-5 and 18-21; and Figures 4 and 5 of the Applicant’s Specification.

17 Turning to the cited art, without conceding that Sanger and Williams
18 provide the teaching for which they are cited in the Action, Applicant submits that
19 in regard to claim 9, Williams fails to provide the teachings missing from Sanger
20 for the same reasons discussed above for claim 1, in addition to the following
21 remarks.

22 Williams fails to teach “...an order management system for communicating
23 between a number pooling authority and a plurality of further components of the
24 service provider...wherein the order management system is for updating the
25 further components with information relating to telephone numbers that are
received when the service provider receives the block of telephone
numbers...wherein the order management system is for obtaining the location
routing number from a database containing the block of telephone numbers

1 received by the service provider..." as recited in Applicant's amended claim 9.
2 Instead, Williams teaches methods for facilitating the retrieval of the local routing
3 numbers (LRN) of individual ported numbers, when a call is placed from a calling
4 party to a ported number (Williams, Col. 4, lines 34-56). Williams does not
5 disclose an order management system for retrieving local routing numbers and for
6 updating the components of a service provider.

7 The combination of Sanger and Williams does not teach or suggest every
8 element of Applicant's amended claim 9. For at least these reasons, the Applicant
9 requests reconsideration and withdrawal of the §103 rejection of claim 9.

10 11 **Claims 10-11**

12 Claims 10-11 depend directly or indirectly from claim 9 and stand rejected
13 on similar grounds. The above comments directed to claim 9 apply equally to
14 these dependent claims that, for their own recited features, and in combination
15 with those recited in claim 9, are not taught by Sanger and Williams.

16 17 **New Claims 12 and 13**

18 The Applicant submits that the additions of claim 12 and claim 13 are fully
19 supported under §112, 1st paragraph, in several places throughout the Applicant's
20 Specification. In particular, the recited language of claim 12 pertaining to the
21 "order management system updates the plurality of further components of the
22 service provider..." is fully supported under §112, 1st paragraph, at least by page
23 9, lines 1-5, and page 10, lines 7-14 of the Applicant's Specification.

1 Claim 13, and the recited improvement "the local number portability
2 gateway including an order management system component that is an interface
3 between the number portability administration center and the local number
4 portability gateway, the block administration center, the facility maintenance
5 system customer billing system, and the facility maintenance system," is fully
6 supported in the Applicant's description at least by page 8, lines 22-27 and page 9
7 lines 1-3. Both claims 12 and 13 are fully supported under §112 1st paragraph by
8 Figures 4 and 5 of the Applicant's Specification.

9 Applicant respectfully requests consideration of new claims 12 and 13.
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Conclusion

The Applicant submits that the claims are in condition for allowance and respectfully requests that a Notice of Allowability be issued. If the Office's next anticipated action is not the issuance of a Notice of Allowability, the Applicant respectfully requests that the undersigned attorney be contacted for the purpose of scheduling an interview.

Respectfully Submitted,

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